

# Comments on CalRecycle Background Paper

## *Evaluation of Home-Generated Pharmaceutical Programs in California*

Issued July 12, 2010

On July 20<sup>th</sup>, CalRecycle held the “California Collection Review”, allowing stakeholders to attend their presentation. It was apparent that a significant amount of time and hard work was utilized by those presenting to bring together all the data that was shared. It is certainly refreshing that the stakeholders are allowed to comment on this report, especially since the spirit of the review is to share data that will help the citizens of California find the most efficient methods to dispose of unneeded pharmaceutical medications. To follow are comments intended to help this process.

Page 14, discusses the accessibility for the public to utilize a collection program. As it relates to the mail back envelope program, the United States Postal Service noted that there are roughly 22,000 letter drop boxes currently in the State of California as well as 1,850 post offices. This data shows that there is significant access for those choosing to use a mail back program, allowing them to dispose of their medications 24 hours a day.

- It is recommended that this data be included in this report.

Page 16 discusses the cost of collection programs. Under “Limitations”, paragraph two discusses that staff time was not included in determining the cost of the programs. Staff time can be relatively expensive when taking into account the salary of police/sheriff personal, pharmacist and other staff. The fully loaded cost of mail back envelopes can be as low as \$3.65, this includes the cost of the envelope, shipping, a police officer receiving the package, tracking and assured witnessed destruction. The only added cost would be the minimal time it might take to hand out an envelope.

- It is recommended that the cost of staff time for all programs be included and that it is noted that the \$3.65 price for the TakeAway envelope includes – cost of envelope, shipping, a police officer receiving the package, tracking and assured witnessed destruction.

Page 17 the charts depicted the cost of collecting pharmaceuticals. As much as 90% of the time, envelopes would be utilized similarly to the San Francisco example depicted in this review. With that in mind, Marjaneh Zarrehparvar from San Francisco noted that in their program, total cost was roughly \$5.50 per envelope. This is a large program, one that currently has purchased 6,000 envelopes to date. The two other programs reviewed are outside of what would be called a normal model collection program: one was a pilot (500 envelopes) to see how envelopes would be used within a hospice community. The second also started within a hospice community (120 envelopes) but later it was decided to move this program to local pharmacies that were hesitant to collect pharmaceuticals within their pharmacies. The program was significantly delayed in getting started.

- It is recommended that the comments that were recorded during the comment period by Marjaneh Zarrehtarvar be included within this report.
- I would also like the opportunity to meet with CalRecycle staff to discuss their calculations for the cost of the mail back programs.

Comments submitted by Mark Stechschulte, Vice President, Sharps Compliance, Inc.